

1 PHILLIP A. TALBERT
Acting United States Attorney
2 PAUL A. HEMESATH
KEVIN C. KHASIGIAN
3 Assistant U. S. Attorneys
501 I Street, Suite 10-100
4 Sacramento, CA 95814
Telephone: (916) 554-2700
5 Attorneys for the United States
6
7

8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

2:20-MC-00072-TLN-EFB

12 Plaintiff,

13 v.

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

14 2019 MERCEDES-BENZ E63 AMG-S, VIN:
WDDZF8KB8KA608709, CALIFORNIA
15 LICENSE NUMBER 1UEV351,

16 APPROXIMATELY 0.041836 BITCOIN,

17 APPROXIMATELY 18.12902639 BITCOIN,

18 APPROXIMATELY 26.56443065 BITCOIN,

19 APPROXIMATELY \$1,712,611.00 IN U.S.
20 CURRENCY,

21 ONE (1) BITCOIN CASASCIUS COIN,

22 ONE (1) CANADIAN GOLD COIN,

23 ONE (1) AMERICAN EAGLE GOLD COIN,

24 ONE (1) CUMMINS ALLISON MONEY
COUNTER,

25 APPROXIMATELY \$3,050.00 SEIZED
FROM LAMASSU BTM LOCATED AT 1301
26 MACARTHUR BOULEVARD, OAKLAND,
CALIFORNIA,

27 APPROXIMATELY \$51,590.00 SEIZED
28 FROM LAMASSU BTM LOCATED AT 395

BIRD AVENUE, SAN JOSE, CALIFORNIA,
APPROXIMATELY \$2,475.00 SEIZED
FROM LAMASSU BTM LOCATED AT 1310
BROADWAY, OAKLAND, CALIFORNIA,
APPROXIMATELY \$1,945.00 SEIZED
FROM LAMASSU BTM LOCATED AT 1305
N. BASCOM, SAN JOSE, CALIFORNIA,
APPROXIMATELY \$20,090.00 SEIZED
FROM LAMASSU BTM LOCATED AT 996
PINE STREET, SAN FRANCISCO,
CALIFORNIA,
APPROXIMATELY \$3,115.00 SEIZED
FROM LAMASSU BTM LOCATED AT
25757 SOTO ROAD, HAYWARD,
CALIFORNIA,
APPROXIMATELY \$24,890.00 SEIZED
FROM LAMASSU BTM LOCATED AT 1894
UNIVERSITY AVENUE, BERKELEY,
CALIFORNIA,
APPROXIMATELY \$3,800.00 SEIZED
FROM LAMASSU BTM LOCATED AT 7500
COMMERCIAL BOULEVARD, COTATI,
CALIFORNIA,
APPROXIMATELY \$3,325.00 SEIZED
FROM LAMASSU BTM LOCATED AT
14701 SAN PABLO AVENUE, SAN PABLO,
CALIFORNIA,
APPROXIMATELY \$3,785.00 SEIZED
FROM LAMASSU BTM LOCATED AT 3210
BUSKIRK AVENUE, PLEASANT HILL,
CALIFORNIA,
APPROXIMATELY \$2,835.00 SEIZED
FROM LAMASSU BTM LOCATED AT 605
CONTRA COSTA BOULEVARD,
CONCORD, CALIFORNIA,
APPROXIMATELY \$6,480.00 SEIZED
FROM LAMASSU BTM LOCATED AT 860
ARDEN WAY, SACRAMENTO,
CALIFORNIA,
APPROXIMATELY \$22,660.00 SEIZED
FROM LAMASSU BTM, LOCATED AT
1151 GALLERIA BOULEVARD,
ROSEVILLE, CALIFORNIA,

1 APPROXIMATELY \$14,805.00 SEIZED
2 FROM LAMASSU BTM LOCATED AT 5127
3 FRANKLIN BOULEVARD, SUITE 1,
4 SACRAMENTO, CALIFORNIA,

5 APPROXIMATELY \$10,340.00 SEIZED
6 FROM LAMASSU BTM LOCATED AT 620
7 W. CHARTER WAY, STOCKTON,
8 CALIFORNIA,

9 APPROXIMATELY \$6,010.00 SEIZED
10 FROM LAMASSU BTM LOCATED AT 4709
11 FLORIN ROAD, SACRAMENTO,
12 CALIFORNIA,

13 APPROXIMATELY \$6,125.00 SEIZED
14 FROM LAMASSU BTM LOCATED AT 2221
15 DEL PASO ROAD, SACRAMENTO,
16 CALIFORNIA,

17 APPROXIMATELY \$130.00 SEIZED FROM
18 LAMASSU BTM LOCATED AT 1744 N.
19 TEXAS STREET, FAIRFIELD,
20 CALIFORNIA, AND

21 APPROXIMATELY \$5,915.00 SEIZED
22 FROM LAMASSU BTM LOCATED AT 400
23 LINCOLN ROAD EAST, VALLEJO,
24 CALIFORNIA,

25 Defendants.

26 It is hereby stipulated by and between the United States of America and potential claimants
27 Rehan Alvi and Rubina Alvi (“claimants”), by and through their respective counsel as follows:

28 1. On or about November 26, 2019, the Homeland Security Investigations and Federal
Bureau of Investigation seized the above-referenced defendant assets pursuant to Federal seizure
warrants (hereafter collectively “defendant assets”).

2. Under 18 U.S.C. §§ 983(a)(1)(A)(i)-(iv), and 983(a)(3)(A), the United States is required
to send notice to potential claimants, file a complaint for forfeiture against the defendant assets, or
obtain an indictment alleging that the defendant assets are subject to forfeiture within ninety days of
seizure, unless the court extends the deadline for good cause shown or by agreement of the parties. That
deadline was April 17, 2020.

3. By Stipulation and Order filed April 1, 2020, the parties stipulated to extend to July 16,
2020, the time in which the United States is required to file a civil complaint for forfeiture against the

1 defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to
2 forfeiture.

3 4. By Stipulation and Order filed June 25, 2020, the parties stipulated to extend to October
4 14, 2020, the time in which the United States is required to file a civil complaint for forfeiture against
5 the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to
6 forfeiture.

7 5. By Stipulation and Order filed October 14, 2020, the parties stipulated to extend to
8 December 14, 2020, the time in which the United States is required to file a civil complaint for forfeiture
9 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject
10 to forfeiture.

11 6. By Stipulation and Order filed December 11, 2020, the parties stipulated to extend to
12 March 15, 2021, the time in which the United States is required to file a civil complaint for forfeiture
13 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject
14 to forfeiture.

15 7. By Stipulation and Order filed March 16, 2021, the parties stipulated to extend to May
16 14, 2021, the time in which the United States is required to file a civil complaint for forfeiture against
17 the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to
18 forfeiture.

19 8. By Stipulation and Order filed May 17, 2021, the parties stipulated to extend to August
20 12, 2021, the time in which the United States is required to file a civil complaint for forfeiture against
21 the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to
22 forfeiture.

23 9. By Stipulation and Order filed August 10, 2021, the parties stipulated to extend to
24 November 9, 2021, the time in which the United States is required to file a civil complaint for forfeiture
25 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject
26 to forfeiture.

27 10. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
28 February 7, 2022, the time in which the United States is required to file a civil complaint for forfeiture

1 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject
2 to forfeiture.

3 11. Accordingly, the parties agree that the deadline by which the United States shall be
4 required to file a complaint for forfeiture against the defendant assets and/or to obtain an indictment
5 alleging that the defendant assets are subject to forfeiture shall be extended to February 7, 2022.

6 Dated: 11/8/2021

PHILLIP A. TALBERT
Acting United States Attorney

7
8 By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney

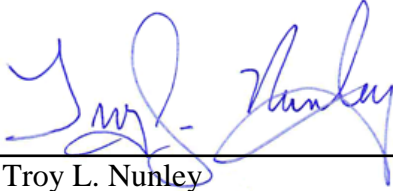
9
10 Dated: 11/8/2021

/s/ Thomas A. Johnson
THOMAS A. JOHNSON
Attorney for Potential Claimants
Rehan and Rubina Alvi

13 (Signatures authorized by email)

14 **IT IS SO ORDERED.**

15 Dated: November 8, 2021

16
17 
18 Troy L. Nunley
United States District Judge